

Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	American Furniture Company, Inc.	Registration Number:	30692
Facility name:	American Furniture Company, Inc.	AFS Number:	51-089-0064
Facility Location:	Route 966	Permit Number:	VA-30692
	P. O. Box 5071		
	Martinsville, VA 24115-5071		

February 1, 2002

Permit Effective Date

January 31, 2007

Permit Expiration Date

Originally signed December 28, 2001, amended June 18, 2002, **amended April 21, 2005**

Robert G. Burnley
Director, Department of Environmental Quality

Signature Date

Permit consists of 47 pages

American Furniture Company, Inc.
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I. Facility Information

Permittee

American Furniture Company, Inc.
P.O. Box 5017
Martinsville, VA 24115-5071

Responsible Official

Mr. Jim Parks
Vice President, Operations

Facility

American Furniture Company, Inc.
Route 966
Martinsville, VA 24115

Contact Person

Bob Gerken,
Director of Engineering Services
276/634-4048

Registration Number:

AFS Identification Number: 51-089-0064

Facility Description: SIC Code 2511 – American Furniture Company, Inc. is a manufacturer of furniture and has the potential to operate 24 hours per day, 7 days per week, 52 weeks per year. The facility manufactures furniture from rough cut wood that is dried, milled, machined, sawed, sanded, assembled, finished and shipped. The plant is a subsidiary of La-z-boy Furniture. Portions of the facility are covered by permit while other portions of the facility have never been permitted. Current State NSR permits effective for this facility include:

- March 29, 1991 amended **August 30, 2001** for Fritz Press and Columbia-3 opening press;
- February 10, 2000 amended October 19, 2001 amended **December 21, 2004** for Plant 8 and Sample Plant finishing operations and a Tape Face Veneer spray booth;
- September 27, 1993 amended **November 10, 1993** for miscellaneous woodworking equipment;
- September 2, 1999 amended **June 14, 2002** for the Combustion Engineering boiler; and
- **September 30, 2002** for the Flat Finishing line

Non- permitted emissions units include a 13.6×10^6 Btu/hr wood-fired boiler and the main furniture finishing operation.

II. Equipment to be operated

1. Equipment to be operated consists of:

B. Significant Emissions Units

Emission Unit ID	Emission Unit Description	Capacity/ Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
B02	Keeler (B02)	13.6 x 10 ⁶ Btu/hr	1 - Multicyclone	MC02	none
Fuel Burning Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
B01	Combustion Engineering Model CE-VU10	48.6 x 10 ⁶ Btu/hr	2 - Multicyclones in series	MC01A & MC01B	9/2/99, amended 6/14/02
Woodworking Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
W06	Miscellaneous woodworking equipment	Various	Fabric filters	BH03 - BH12	9/27/93 amended 11/10/93
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 40 (Existing)					
FG09	Finishing line w/ 12 spray booths, 3 drying ovens, 1 washoff tank, misc. gluing operations, 2 offline repair spray booths, and an edge fill spray booth	Various	Spray booth filters		none
S04	an edge fill spray booth	Various	Spray booth filters		none
C05	an offline repair spray booth and a washoff tank	Various	Spray booth filters		none

Emission Unit ID	Emission Unit Description	Capacity/Size	Pollution Control Device (PCD)	PCD ID	Applicable Permit Date
Furniture Finishing Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
S04	Sample plant finishing with 2 spray booths	Various	Spray booth filters		2/10/00 amended 10/19/01 amended 12/21/04
F01	flat finishing line	varies	none		09/30/02
C05	Plant 8 finishing line with 4 spray booths and 4 drying ovens	Various	Spray booth filters		2/10/00 amended 10/19/01 amended 12/21/04
Furniture Gluing Equipment Subject to 9 VAC 5 Chapter 50 (New or Modified)					
V07A	Fritz press	231 lbs glue/hr	none		3/29/91 amended 8/30/01
V07B	Columbia - 3 opening press	43 lbs glue/hr	none		3/29/91 amended 8/30/01
TV03	Tape Face Veneer spray booth		Spray booth filters		2/10/00 amended 10/19/01 amended 12/21/04

C. Insignificant Activities

The following emission units at the facility are identified in the application as being subject to 9 VAC 5 Chapter 40 or Chapter 50 and are listed as insignificant emission units in 9 VAC 5-80-720:

Emission Unit ID	Emission Unit Description	Capacity/ Size	Applicable Requirement
Emissions Units with Insignificant Emissions Levels 9 VAC 5-80-720 B			
K14	Wood drying kilns	10.5 x 10 ⁶ board-feet per year	9 VAC 5-40-80
AGT12	Above ground fuel storage tanks	250 gal. (gasoline) 500 gal.; 275 gal. (diesel)	
Emissions Units of Insignificant Size or Production Rate 9 VAC 5-80-720 C			
B11	Natural gas-fired oil heater for Fritz press	1.14 x 10 ⁶ Btu/hr	9 VAC 5-40-80
DE13	Diesel engine fire pump	260 HP	9 VAC 5-40-280

These emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110. Provided, however, that one or more of the emission units identified above shall be subject to monitoring, recordkeeping, and reporting requirements pursuant to 9 VAC 5-80-110 if, in the Director's determination, operation of the emission unit(s) indicates a failure to comply with 9 VAC 5-40-80, 9 VAC 5-40-260, or 9 VAC 5-40-280. The Director shall permit revision proceedings in accordance with 9 VAC 5-80-190 through 9 VAC 5-80-240, as appropriate, to impose specific permit conditions upon such noncomplying emission unit(s). (9 VAC 5-40-80, 9 VAC 5-40-260, 9 VAC 5-80-110, 9 VAC 5 Chapter 80 Article 4).

III. Fuel Burning - Combustion Engineering 48.6 x 10⁶ Btu/hr boiler (B01)

A. Emission Control

Particulate emissions from the Combustion Engineering (B01) boiler shall be controlled by two multicyclones in series. The multicyclones shall be provided with adequate access for inspection. (9 VAC 5-80-10 H, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 9/2/99, amended 6/14/02)

B. Limitations

- The (B01) boiler is restricted to the fuel wood, including wood materials generated from the manufacturing processes of sources with SIC 2511, and fuel limitation of 7,900 tons per year. Usage shall be calculated monthly as the sum of each consecutive 12-month period. A change to a fuel not listed above may require a permit modification.
 (9 VAC 5-80-10, 9 VAC 5-50-50, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B, Condition 5 NSR permit dated 9/2/99, amended 6/14/02)

2. Emissions from the operation of the CE (B01) boiler shall not exceed the limits specified below:

Particulate Matter	0.26 lbs/10 ⁶ Btu	16.7 tons/yr
PM-10	0.26 lbs/10 ⁶ Btu	16.7 tons/yr
Sulfur Dioxide	55.4 lbs/hr	39.0 tons/yr
Nitrogen Oxides (as NO ₂)	17.8 lbs/hr	12.5 tons/yr
Carbon Monoxide	73.5 lbs/hr	95.5 tons/yr
Volatile Organic Compounds	7.6 lbs/hr	9.9 tons/yr

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 6 NSR permit dated 9/2/99, amended 6/14/02)

3. Visible emissions from the CE (B01) boiler exhausts shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-50-80, 9 VAC 5-80-110 K, Condition 7 NSR permit dated 9/2/99, amended 6/14/02)

4. Deleted.

C. Monitoring

At least one time per week in which the boiler operates an observation of the presence of visible emissions from the CE (B01) boiler stack shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the boiler resumes operation with no visible emissions, or,
2. conduct a visible emission evaluation (VEE) be in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the (B01) boiler are 20 percent opacity or less. If any of the observations exceed the CE (B01) boiler opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the CE (B01) boiler resumes operation within the 20% opacity limit.

The permittee shall maintain a CE (B01) boiler stack observation log at least one time for each week in which the boiler operates to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the CE (B01) boiler, with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Develop an inspection schedule, annual at a minimum, to insure operational and structural integrity of the CE (B01) boiler and multicyclones and maintain records of inspection results.
3. Have available written operating procedures for the CE (B01) boiler and multicyclones. These procedures shall be based on the manufacturer's recommendations, at minimum.
4. Train operators in the proper operation of the CE (B01) boiler and multicyclones, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110 K, 9 VAC 5-80-110 F, 9 VAC 5-170-160, Condition 12 NSR permit dated 9/2/99, amended 6/14/02)

E. Recordkeeping

Emission recordkeeping for the CE (B01) boiler shall consist of the following fuel consumption and operating data:

1. The annual consumption of wood fuel calculated monthly as the sum of each consecutive 12-month period.
2. Wood shipments purchased, indicating heat content per shipment and monthly records for wood fuel produced by the facility indicating the heat content of the wood fuel used.
3. Records of the visible emission and opacity observations from the CE (B01) boiler as required by Condition III.C.
4. Records of maintenance, inspections, and training for the CE (B01) boiler as required by Condition III.D.

Annual emission rates are to be calculated as the sum of each consecutive twelve-month period. The content of and format of such records shall be arranged with West Central Regional Office. These records shall be made available on site for inspection by the DEQ personnel upon request and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F, 9 VAC 5-170-160, Condition 9 NSR permit dated 9/2/99, amended 6/14/02)

IV. Fuel Burning - Keeler 13.6 x 10⁶ Btu/hr boiler (B02)

A. Emission Control

Particulate emissions from the Keeler (B02) boiler shall be controlled by a multicyclone. The multicyclone shall be provided with adequate access for inspection.
(9 VAC 5-40-20 E, 9 VAC 5-80-110 C)

B. Limitations

1. Emissions from the operation of the Keeler (B02) boiler shall not exceed the limits specified below:

Particulate Matter	0.55 lbs/10 ⁶ Btu *heat input hourly emission limit
PM-10	0.55 lbs/10 ⁶ Btu *heat input hourly emission limit
Sulfur Dioxide	2.64 lbs/10 ⁶ Btu *heat input hourly emission limit

(9 VAC 5-40-900, 9 VAC 5-40-930, 9 VAC 5-80-110 B)

2. Visible emissions from the Keeler (B02) boiler exhaust shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-40-940, 9 VAC 5-80-110 K)

C. Monitoring

At least one time per week in which the boiler operates an observation of the presence of visible emissions from the Keeler (B02) boiler stack shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the boiler resumes operation with no visible emissions, or,
2. conduct a visible emission evaluation (VEE) be in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the Keeler (B02) boiler are 20 percent opacity or less. If any of the observations exceed the Keeler (B02) boiler opacity limitation of 20%, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the Keeler (B02) boiler resumes operation within the 20% opacity limit.

The permittee shall maintain a Keeler (B02) boiler stack observation log at least one time per week in which the boiler operates to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Keeler (B02) boiler, with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Develop an inspection schedule, annual at a minimum, to insure operational and structural integrity of the Keeler (B02) boiler and multicyclone and maintain records of inspection results.
3. Have available written operating procedures for the Keeler (B02) boiler and multicyclone. These procedures shall be based on the manufacturer's recommendations, at minimum.
4. Train operators in the proper operation of the Keeler (B02) boiler and multicyclone, and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-40-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F)

E. Recordkeeping

Emission recordkeeping for the Keeler (B02) boiler shall consist of the following fuel consumption and operating data:

1. The annual consumption of wood fuel calculated monthly as the sum of each consecutive 12-month period.
2. Wood shipments purchased, indicating heat content per shipment and monthly records for wood fuel produced by the facility indicating the heat content of the wood fuel used.
3. The annual hours of operation of the Keeler (B02) boiler, calculated as the sum of each consecutive 12-month period.
4. Records of the visible emission and opacity observations from the Keeler (B02) boiler as required by Condition IV.C.
5. Records of maintenance, inspections, and training for the Keeler (B02) boiler as required by Condition IV.D.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be made available on site for inspection by the DEQ personnel upon request and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading

and offsets.)

(9 VAC 5-40-50, 9 VAC 5-80-110 K)

V. Woodworking Conditions (W06)

A. Emission Control

1. Particulate emissions from the woodworking equipment (W06) shall be controlled by fabric filters. The fabric filters shall be provided with adequate access for inspection. Each fabric filter shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.

(9 VAC 5-80-10 H, 9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 9/27/93)

2. All subsequent transfer of the collected material from the woodworking equipment (W06) shall be controlled by a fabric filter or a completely enclosed transfer system.

(9 VAC 5-170-160, 9 VAC 5-80-110 C, Condition 4 NSR permit dated 9/27/93)

B. Limitations

1. The annual throughput of wood for the entire woodworking facility shall not exceed 38,540,000 board feet, calculated as the sum of each consecutive 12-month period.

(9 VAC 5-170-160, 9 VAC 5-80-110, Condition 6 NSR permit dated 9/27/93)

2. Emissions from the operation of the woodworking equipment (W06) shall not exceed the limits specified below:

Particulate Matter	0.01 gr/dscf	11.0 lbs/hr	26.3 tons/yr
PM-10		11.0 lbs/hr	26.3 tons/yr

The lbs/hr and tons/yr emissions are derived from the estimated overall emission contribution.

Compliance with these limits shall be determined as stated in Conditions V.A. and V.B.1.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 7 NSR permit dated 9/27/93, amended 11/10/93)

3. Visible emissions from the fabric filters shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-170-160, 9 VAC 5-50-20, 9 VAC 5-80-110 K, Condition 8 NSR permit dated 9/27/93)

4. Visible emissions from any fugitive emission points shall not exceed five (5) percent opacity as

determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.

(9 VAC 5-170-160, 9 VAC 5-50-20, 9 VAC 5-80-110 K, Condition 9 NSR permit dated 9/27/93)

C. Monitoring

At least one time per week in which the fabric filters operate an observation of the presence of visible emissions from the fabric filter exhaust stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. The permittee shall maintain a fabric filter observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the fabric filters, with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Develop an inspection schedule, monthly at a minimum, to insure operational integrity of the fabric filters and maintain records of inspection results.
3. Have available written operating procedures for the fabric filters. These procedures shall be based on the manufacturer's recommendations, at minimum.
4. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 15 & 16 NSR permit dated 9/27/93)

E. Recordkeeping

Emission recordkeeping for the woodworking operation not otherwise required by this permit shall consist of the following operating data:

1. The monthly and annual throughput of wood in board feet. Annual throughput shall be calculated as the sum of each consecutive 12-month period.
2. Records of the visible emission and opacity observations for the fabric filters as required by Condition V.C.

3. Records of maintenance and inspections for the fabric filters as required by Condition V.D.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F, Condition 11 NSR permit dated 9/27/93, amended 11/10/93)

VI. Veneer Press Conditions (V07)

A. Limitations

1. The Fritz press (V07A) shall not operate more than 16 hours per day.
(9 VAC 5-170-160, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B, Condition 3 NSR permit dated 3/29/91 amended 8/30/01)
2. The Columbia 3-opening press shall not operate more than 8 hours per day.
(9 VAC 5-170-160, 9 VAC 5-80-110 A, 9 VAC 5-80-110 B, Condition 4 NSR permit dated 3/29/91 amended 3/29/01)
3. Visible emissions from each of the presses shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-170-160, 9 VAC 5-50-20, 9 VAC 5-80-110 K, Condition 6 NSR permit dated 3/29/91 amended 3/29/01)

B. Monitoring

At least one time per week in which the presses operate an observation of the presence of visible emissions from the press exhaust stacks shall be made. If visible emissions are observed, timely corrective action shall be taken such that the press resumes operation with no visible emissions. The permittee shall maintain a press stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name. If a press has not been operated for any period during the week, it shall be noted in the log book.
(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

C. Recordkeeping

Emission recordkeeping for the presses, not otherwise required by this permit, shall consist of the following operating data:

1. The number of hours per day of operation of each press.

2. Records of the visible emission and opacity observations for the presses required by Condition VI.B.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)
(9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 7 NSR permit dated 3/29/91 amended 8/30/01)

VII. Tape Face Veneer Conditions (TV03)

A. Emission Control

Particulate emissions from the Tape Face Veneer spray booth shall (TV03) be controlled by fiberglass filters or equivalent. The spray booth shall be provided with adequate access for inspection.
(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

B. Limitations

Visible emissions from the Tape Face Veneer spray booth (TV03) exhaust shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 8 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

C. Monitoring

At least one time per week in which the spray booth operates an observation of the presence of visible emissions from the Tape Face Veneer spray booth (TV03) stack shall be made. If visible emissions are observed, timely corrective action shall be taken such that the spray booth resumes operation with no visible emissions. The permittee shall maintain a spray booth stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.
(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Tape Face Veneer spray booth (TV03), with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Have available written operating procedures for the Tape Face Veneer spray booth. These procedures shall be based on the manufacturer's recommendations, at minimum.

3. Train operators in the proper operation of the Tape Face Veneer spray booth and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (Training can be the same as that required by MACT JJ).
4. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-50-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 13 permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

E. Recordkeeping

Emission recordkeeping for the Tape Face Veneer spray booth (TV03) not otherwise required by this permit shall consist of the following operating data:

1. Records of the visible emission and opacity observations for the Tape Face Veneer spray booth stack as required by Condition VII.C.
2. Records of maintenance, inspections, and training for the Tape Face Veneer spray booth as required by Condition VII.D. (Training can be the same as that required by MACT JJ).

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F)

VIII. Sample Plant Finishing Conditions (S04)

A. Emission Control

Particulate emissions from the Sample Plant spray booths (S04) shall be controlled by fiberglass filters or equivalent. The spray booths shall be provided with adequate access for inspection.

(9 VAC 5-50-260 F, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 2/10/00 amended 10/19/01 amended 10/19/01 amended 12/21/04)

B. Limitations

1. Emissions from the operation of the Sample Plant spray booths (S04), except the edge fill spray booth, shall not exceed the limits specified below:

Volatile Organic Compounds	11.5 lb/hr	14.3 tons/yr
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Compliance with the annual emission limit shall be determined by material balance as stated in Condition VIII.E.1.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 6 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

2. Visible emissions from the Sample Plant spray booth (S04) exhausts shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 8 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

C. Monitoring

At least one time per week in which the spray booth operates an observation of the presence of visible emissions from the Sample Plant spray booth (S04) exhaust stacks shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the spray booth, with visible emissions, resumes operation with no visible emissions, or,
2. conduct a visible emission evaluation (VEE) on the spray booth, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booths are in compliance. If any of the observations exceed the compliance opacity limitation, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the spray booth resumes operation within the opacity limitation.

The permittee shall maintain a spray booth stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Sample Plant spray booths (S04), with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Develop an inspection schedule, monthly at minimum, to insure the operational integrity of the filters and maintain records on inspection results.
3. Have available written operating procedures for the Sample Plant spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.

4. Train operators in the proper operation of the Sample Plant spray booths and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (Training can be the same as that required by MACT JJ).
5. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 13 permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

E. Recordkeeping

Emission recordkeeping for the Sample Plant spray booths (S04) not otherwise required by this permit shall consist of the following operating data:

1. A monthly and annual material balance including the emissions of VOCs from the Sample Plant spray booths, except the edge fill spray booth. Annual emissions shall be calculated as the sum of each consecutive 12-month period.
2. Records of the visible emission and opacity observations for the Sample Plant spray booth stacks as required by Condition VIII.C.
3. Records of maintenance, inspections, and training for the Sample Plant spray booths as required by Condition VIII.D.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F, Condition 10 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

IX. Plant 8 Finishing Line Conditions (C05)

A. Emission Control

Particulate emissions from all spraybooths associated with Plant 8 shall be controlled by fiberglass filters or equivalent. The spray booths shall be provided with adequate access for inspection.

(9 VAC 5-50-260, 9 VAC 5-80-110 C, Condition 3 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

B. Limitations

1. Emissions from the operation of Plant 8, shall not exceed the limits specified below:

Volatile Organic Compounds 44.0 lb/hr 55.7 tons/yr

Compliance with the annual emission limit shall be determined by material balance as stated in Condition IX.E.1.

(9 VAC 5-50-260, 9 VAC 5-80-110 B, Condition 7 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

2. Visible emissions from all Plant 8 spraybooths shall not exceed five (5) percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260, 9 VAC 5-80-110 K, Condition 8 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

C. Monitoring

At least one time per week in which Plant 8 operates an observation of the presence of visible emissions from Plant 8 spray booth exhaust stacks shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the spray booth, with visible emissions, resumes operation with no visible emissions, or,
2. conduct a visible emission evaluation (VEE) on the spray booth, with visible emissions, in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booths are in compliance. If any of the observations exceed the compliance opacity limitation, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the spray booth resumes operation within the opacity limitation.

The permittee shall maintain a spray booth stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Plant 8 spray booths, with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance and inspection schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Develop an inspection schedule, monthly at minimum, to insure the operational integrity of the filters and maintain records on inspection results.

3. Have available written operating procedures for the Plant 8 spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.
4. Train operators in the proper operation of the Plant 8 spray booths and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (Training can be the same as that required by MACT JJ).
5. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 13 permit dated 2/10/00) amended 10/19/01 amended 12/21/04)

E. Recordkeeping

Emission recordkeeping for Plant 8 spray booths not otherwise required by this permit shall consist of the following operating data:

1. A monthly and annual material balance including the emissions of VOCs from Plant 8 line spray booths, except the offline repair spray booth. Annual emissions shall be calculated as the sum of each consecutive 12-month period.
2. Records of the visible emission and opacity observations for Plant 8 spray booth stacks as required by Condition IX.C.
3. Records of maintenance, inspections, and training for Plant 8 spray booths as required by Condition IX.D.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary to the permittee for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F, Condition 9 NSR permit dated 2/10/00 amended 10/19/01 amended 12/21/04)

X. Flat Finishing Line (F01)

A. Emission Control

Fugitive emission controls shall include the following, or equivalent, as a minimum. Volatile organic compounds shall not be intentionally spilled, discarded to sewers, stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution control practices for minimizing emissions.

(9 VAC 5-50-260 and 9 VAC 5-50-20F, Condition 3 NSR permit dated 9/30/02)

B. Limitations

1. The throughput of volatile organic compounds to the flat finishing line shall not exceed 39.0 tons per year, calculated monthly as the sum of each consecutive 12 month period.
(9 VAC 5-80-1180 and 9 VAC 5-170-160, Condition 4 NSR permit dated 9/30/02)

2. Emissions from the operation of the flat finishing line shall not exceed the limits specified below:

Volatile Organic Compounds	39.0 tons/yr
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Emissions shall be calculated as the sum of each consecutive 12-month period.
(9 VAC 5-50-260, 9 VAC 5-50-180, and 5-80-1700A, Condition 5 NSR permit dated 9/30/02)

3. Visible emissions from the flat finishing line exhaust shall not exceed 5 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown and malfunction.
(9 VAC 5-50-80, 9 VAC 5-50-260, and 9 VAC 5-50-20A4, Condition 6 NSR permit dated 9/30/02)

C. Monitoring

At least one time per month in which the flat finishing line operates an observation of the presence of visible emissions from the flat finishing line exhaust stacks shall be made. The presence of visible emissions shall require the permittee to:

1. take timely corrective action such that the flat finishing line resumes operation with no visible emissions, or,
2. conduct a visible emission evaluation (VEE) on the flat finishing line exhaust in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booths are in compliance. If any of the observations exceed the compliance opacity limitation, the observation period shall continue until a total of sixty (60) minutes of observation have been completed. Timely corrective action shall be taken, if necessary, such that the flat finishing line resumes operation within the opacity limitation.

The permittee shall maintain a flat finishing line observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

D. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Flat Finishing Line, with respect to process equipment which affect such emissions:

1. Develop a maintenance and inspection schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Maintain an inventory of spare parts.
3. Have available written operating procedures for the flat finishing line. These procedures shall be based on the manufacturer's recommendations, at minimum.
4. Train operators in the proper operation of the flat finishing line and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (Training can be the same as that required by MACT JJ).

(9 VAC 5-170-160, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F, Condition 15 NSR permit dated 9/30/02)

E. Recordkeeping

The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the West Central Regional Office. These records shall include, but are not limited to:

1. Monthly and annual throughput (in tons of VOCs) for the operation of the flat finishing line. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.
2. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, HAP content, water content, and solids content for each stain and lacquer used.
3. HAPs emissions from the flat finishing line shall be included in total plant HAP emissions for Title V and MACT JJ recordkeeping (not broken out).
4. Records of the visible emission and opacity observations for the flat finishing line exhaust stacks as required by Condition X.C.
5. Records of maintenance, inspections, and training for Flat Finishing Line as required by Condition X.D.

These records shall be available for inspection by the DEQ and shall be current for at least the most recent five years.

(9 VAC 5-50-50, Condition 9 NSR permit dated 9/30/02)

XI. Plant 7 Finishing Room Conditions (FG09)

A. Emission Control

1. Particulate emissions from the Plant 7 Finishing Room spray booths shall be controlled by paint booth filters or equivalent.
(9 VAC 5-40-20 E, 9 VAC 5-80-110 C)
2. Visible emissions from the Plant 7 Finishing Room spray booths shall not exceed 20 percent opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-40-80, 9 VAC 5-80-110 K)

B. Monitoring

At least one time per week in which the finishing room spray booth operates an observation of the presence of visible emissions from the Plant 7 Finishing Room spray booth stacks shall be made. If visible emissions are observed:

1. timely corrective action shall be taken such that the spray booth resumes operation with no visible emissions, or
2. conduct a visible emission evaluation (VEE) in accordance with EPA Method 9 (reference 40 CFR 60, Appendix A) for a minimum of six (6) minutes, to assure visible emissions from the spray booth are 20 percent opacity or less.

The permittee shall maintain a spray booth stack observation log to demonstrate compliance. The log shall include the date and time of the observations, whether or not there were visible emissions, the results of all VEEs, any necessary corrective action, and the observer's name.

(9 VAC 5-80-110 E, 9 VAC 5-80-110 K)

C. Maintenance/Operating Procedures

The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions from the Plant 7 Finishing Room spray booths, with respect to air pollution control equipment and process equipment which affect such emissions:

1. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
2. Have available written operating procedures for the Plant 7 Finishing Room spray booths. These procedures shall be based on the manufacturer's recommendations, at minimum.
3. Train operators in the proper operation of the Plant 7 Finishing Room spray booths and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training (Training can be the same as that required by MACT JJ).

4. Maintain an inventory of spare parts that are needed to minimize durations of air pollution control equipment breakdowns.

(9 VAC 5-40-20, 9 VAC 5-80-110 K, 9 VAC 5-80-110 F)

D. Recordkeeping

Emission recordkeeping for the Plant 7 Finishing Room spray booths not otherwise required by this permit shall consist of the following operating data:

1. Records of the visible emission and opacity observations for the Plant 7 Finishing Room spray booth stacks as required by Condition XI.B.
2. Records of maintenance, inspections, and training for the Plant 7 Finishing Room spray booths as required by Condition XI.C.

The content of and format of such records shall be arranged with the West Central Regional Office. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years. (Retention of the foregoing records for a period of ten (10) years may be necessary for the purpose of emissions netting, banking, trading and offsets.)

(9 VAC 5-50-50, 9 VAC 5-80-110 F)

XII. MACT Conditions

The facility is to be operated in compliance with Federal requirements under 40 CFR 63, Subpart JJ, including future revisions (current copy attached). All terms used regarding 40 CFR 63, Subpart JJ shall have the meanings as defined in 40 CFR 63.801 and 40 CFR 63.2.

(9 VAC 5-60-100, 40 CFR 63.800, 40 CFR 63, Subpart A)

A. Emission Standard

Volatile Hazardous Air Pollutant (VHAP) emissions from the facility shall not exceed the following limits:

1. For finishing operations use any of the following methods:
 - a. Achieve a weighted average VHAP content across all coatings of 1.0 lb VHAP/lb solids, as applied;
 - b. Use compliant finishing materials that meet the following specifications:
 - (1) Each sealer and topcoat has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - (2) Each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - (3) Each thinner contains no more than 10.0 percent VHAP by weight except where excluded

by (5) of this sub- section;

- (4) Each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied;
 - (5) Each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 1.0 lb VHAP/lb solids and a thinner containing no more than 3.0 percent VHAP by weight;
- c. Use any combination of averaging, compliant coatings, and control device such that no greater than 1.0 lb of VHAP being emitted per lb of solids used.
- 2. For cleaning operations strippable spray booth coatings shall be used that contain no more than 0.8 lb VOC/lb solids, as applied.
 - 3. For contact adhesive operations compliant contact adhesives shall be used based on the following criteria:
 - a. For aerosol adhesives, as well as hot melt, PVA, and urea-formaldehyde adhesives, and for contact adhesives applied to nonporous substrates there is no limit on the VHAP content of these adhesives;
 - b. For foam adhesives used in products that meet flammability requirements the VHAP content can be no more than 1.8 lb VHAP/lb solids, as applied;
 - c. For all other contact adhesives the VHAP content can be no more than 1.0 lb VHAP/lb solids, as applied.

(9 VAC 5-60-100, 40 CFR 63.802)

B. Continuous Compliance

Continuous compliance with the VHAP emissions limits shall be determined as follows:
(See Condition XII.H and XII.I. for content and timing of report submissions and signature requirements)

- 1. For finishing operations when averaging is being used to show continuous compliance, the permittee shall submit the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0. The facility is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

..... Equation 1

E = the emission limit achieved by an emission point or a set of emission points, in lb VHAP/lb solids.

M_c = the mass of solids in a finishing material or coating (c) used monthly, including exempt finishing materials and coatings, lb solids/month.

C_c = the VHAP content of a finishing material or coating (c), in pounds of VHAP per pound of coating solids.

S = the VHAP content of a solvent, expressed as a weight fraction, added to finishing materials or coatings.

W = the amount of solvent, in pounds, added to finishing materials and coatings during the monthly averaging period.

The Emission Limit (E in lb VHAP / lb solids) equals the sum, for all finishing materials and coatings, of the mass of solids in each material used within that month (M_c in lb solids / month) multiplied by the VHAP content in each material (C_c in lb VHAP / lb solids) plus the sum, for all solvents, of the mass of solvent used monthly (W in lb solvent / month) multiplied by the weight fraction of VHAP in the solvent (S in lb VHAP / lb solvent), with this total being divided by the sum, for all finishing materials and coatings, of the mass of solids in each finishing material and coating used within that month (M_c in lb solids / month).

2. For finishing operations when compliant coatings are being used to show continuous compliance, the permittee shall use compliant coatings and thinners, maintain records that demonstrate the finishing materials and thinners are compliant, and submit a compliance certification with the semiannual report which states that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as stated in Condition XII.E.1.a., have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The facility is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
3. For contact adhesive operations when compliant adhesives are being used to show continuous compliance the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
4. For strippable spray booth coatings the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
5. For work practice standards the permittee shall submit a compliance certification with the semiannual report. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been

implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation and the DEQ may require the permittee to modify the plan (see Condition XII.E.1.a.).

(9 VAC 5-60-100, 9 VAC 5-80-110, 40 CFR 63.804(g), 40 CFR 63.8, 9 VAC 5-170-160)

C. Submittals

All submittals regarding 40 CFR 63, Subpart JJ to the Administrator shall be sent to the West Central Regional Office and to EPA Region III at the following address. These submittals shall be made by **March 1** and **September 1** of each calendar year:

U.S. EPA Region III
Air Protection Division (3AP00)
ATTN.: Wood Furniture NESHAP Coordinator
1650 Arch Street
Philadelphia, PA 19103-2029

VA DEQ
West Central Regional Office
ATTN: Air Compliance Manager
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-60-100, 40 CFR 63.13)

D. Operation and Maintenance

The permittee shall meet the following operation and maintenance requirements:

1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.
2. Malfunctions shall be corrected as soon as practicable after their occurrence.
3. Operation and maintenance requirements established pursuant to Section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
4. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the DEQ which may include, but is not limited to review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

(9 VAC 5-60-100, 40 CFR 63.6(e))

E. Work Practice Standards

The permittee shall develop and implement the following work practice standards:

1. Work practice implementation plan - The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for the finishing and gluing operations and addresses each of the work practice standards presented in Conditions b. through l. that follow. The plan shall be developed no more than 60 days after the compliance date. The written work practice implementation plan shall be available for inspection by the DEQ upon request. If the DEQ determines that the work practice implementation plan does not adequately address each of the topics specified in 63.803 of Subpart JJ or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the DEQ may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
2. Operator training course - The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment in these operations, or implementation of the requirements of Subpart JJ. All new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of the compliance date. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
 - a. A list of all current personnel by name and job description that are required to be trained;
 - b. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - c. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
3. Inspection and maintenance plan - The permittee shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
 - a. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
 - b. An inspection schedule;

- c. Methods for documenting the date and results of each inspection and any repairs that were made;
- d. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (1) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five (5) calendar days after the leak is detected; and
 - (2) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.
- 4. Cleaning and washoff solvent accounting system - The permittee shall develop an organic HAP solvent accounting form to record:
 - a. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in §63.801 of Subpart JJ;
 - b. The number of pieces washed off, and the reason for the washoff; and
 - c. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- 5. Chemical composition of cleaning and washoff solvents - The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of Subpart JJ (see attached), in concentrations subject to MSDS reporting as required by OSHA.
- 6. Spray booth cleaning - The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- 7. Storage requirements - The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- 8. Application equipment requirements - The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as

applied;

- (1) For touchup and repair under the following conditions:
 - (2) The touchup and repair occurs after completion of the finishing operation; or
 - (3) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - (4) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
 - (5) When emissions from the finishing application station are directed to a control device;
 - (6) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - (7) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the DEQ a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
 - (a) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (b) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
9. Line cleaning - The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
10. Gun cleaning - The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
11. Washoff operations - The permittee shall control emissions from washoff operations by:
- a. Using normally closed tanks for washoff; and

b. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

12. Formulation assessment plan for finishing operations - The permittee shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

- a. Identifies VHAP from the list presented in Table 5 of Subpart JJ that are being used in finishing operations.
- b. Establishes a baseline level of usage for each VHAP identified. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified, except for formaldehyde and styrene which shall be determined as specified by 363.803 (1)(2). For VHAPs that do not have a baseline, one will be established according to Condition XII.E.12.f. below.
- c. Tracks the annual usage of each VHAP identified that is present in amounts subject to MSDS reporting as required by OSHA.
- d. If the annual usage of the VHAP identified exceeds its baseline level, then the permittee of the facility shall provide a written notification to the West Central Regional Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(1) The exceedance is no more than 15.0 percent above the baseline level;

(2) Usage of the VHAP is below the de minimis level presented in Table 5 of Subpart JJ for that VHAP;

(3) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(4) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.

- e. If none of the explanations listed in Condition XII.E.12.d. above are the reason for the increase, the permittee shall confer with the West Central Regional Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the West Central Regional Office and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of

the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

- f. If the facility uses a VHAP of potential concern listed in Table 6 of Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The permittee shall track the annual usage of each VHAP of potential concern identified that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to the West Central Regional Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in Condition XII.E.12.d. above, the affected source shall follow the procedures established in Condition XII.E.12.e. above.

(9 VAC 5-60-100, 40 CFR 63.803(a)-(l))

F. Testing

If compliance testing is conducted the tests shall be conducted using the test methods and procedures as specified in 40 CFR 63.805 of Subpart JJ.

(9 VAC 5-60-100, 40 CFR 63.805)

G. Recordkeeping

The permittee shall maintain records of the following:

1. For emission limit purposes the permittee shall maintain the following:
 - a. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Subpart JJ;
 - b. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits in Subpart JJ; and
 - c. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Subpart JJ.
2. Following the averaging method the permittee shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
3. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - a. Records demonstrating that the operator training program required by Condition XII.E.2. is in

place;

- b. Records collected in accordance with the inspection and maintenance plan required by Condition XII.E.3.;
 - c. Records associated with the cleaning solvent accounting system required by Condition XII.E.4.;
 - d. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period required by Condition XII.E.8.;
 - e. Records associated with the formulation assessment plan required by Condition XII.E.12.;
 - and
 - f. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- 4. The permittee shall maintain records of the compliance certifications submitted for each semiannual period following the compliance date.
 - 5. The permittee shall maintain records of all other information submitted with the compliance status report and the semiannual reports.
 - 6. The permittee shall maintain files of all information (including all reports and notifications) required, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
- (9 VAC 5-60-100, 40 CFR 63.806, 63.10(b)(1))

H. Notification of Compliance

Each time a notification of compliance status is required, the permittee shall submit to the West Central Regional Office and EPA a notification of compliance status, signed by a responsible official of the company that owns or operates the facility who shall certify its accuracy, attesting to whether the source has complied with Subpart JJ. The notification shall list:

- 1. The methods that were used to determine compliance;
- 2. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or

methods that were conducted;

3. The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;
4. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times and in accordance with the test methods specified;
5. An analysis demonstrating whether the facility is a major source or an area source (using the emissions data generated for this notification);
6. A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and
7. A statement by the permittee as to whether the facility has complied with Subpart JJ as expressed in this permit.

(9 VAC 5-60-100, 40 CFR 63.9(h))

I. Reporting

1. Reporting not otherwise required by this permit shall consist of the following:
 - a. The permittee when demonstrating continuous compliance shall submit a report covering the previous 6 months of wood furniture manufacturing operations:
 - (1) Reports shall be submitted no later than **March 1** and **September 1** of each calendar year.
 - (2) The semiannual reports shall include the information required by Condition XII.B., a statement of whether the facility was in compliance or noncompliance, and, if the facility was in noncompliance, the measures taken to bring the facility into compliance.
 - (3) The frequency of the reports required by Condition XII.I.1.a. above shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.
2. The permittee, when required to provide a written notification by Condition XII.E.12.d. for exceedance of a baseline level [$\geq 63.803(1)(4)$], shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

(9 VAC 5-60-100, 40 CFR 63.807, 63.10(d))

XIII. Other Conditions

A. Visible Emission Standard

Unless otherwise specified in this permit, visible emissions from the any emission unit at this facility shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity, as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).
(9 VAC 5-80-110 A and 9 VAC 5-40-940)

B. Fugitive Dust/Emission Standard

During the operation of a stationary source or any other building, structure, facility or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne.
(9 VAC 5-40-90, 9 VAC 5-50-90, 9 VAC 5-80-110 A)

C. Emission Tests

Upon request of the Department, the permittee shall conduct emission tests in accordance with procedures approved by the Department and provide, or cause to be provided, emission testing facilities as follows:

- Sampling ports adequate for test methods applicable to such source.
- Safe sampling platforms.
- Safe access to sampling platforms.
- Utilities for sampling and testing equipment.

(9 VAC 5-40-30, 9 VAC 5-50-30 F; Condition I.9 & II.5 NSR permit dated 10/29/87; Condition 5 NSR permit dated 9/27/93, amended 11/10/93)

XIV. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen

months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C & F, 9 VAC 5-80-110 D & 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements.
 - b. The date(s) analyses were performed.
 - c. The company or entity that performed the analyses.
 - d. The analytical techniques or methods used.
 - e. The results of such analyses.
 - f. The operating conditions existing at the time of sampling or measurement.(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from

the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G. (Note that much of the recordkeeping required by this permit also serves as required periodic monitoring to determine emissions compliance and therefore needs to be addressed in the periodic reports.) The details of the reports are to be arranged with the Director, West Central Regional Office. The reports shall include:
 - a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
 - b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:
 - (1) Exceedance of emissions limitations or operational restrictions;
 - (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
 - (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."
 - d. The report shall be sent to the following address:

Director, West Central Regional Office
Attn: Air Compliance Manager
Virginia DEQ
3019 Peters Creek Road
Roanoke, VA 24019

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and to DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.

This annual compliance certification shall be sent to the following addresses:

Director, West Central Regional Office
ATTN: Air Compliance Manager
Virginia DEQ
3019 Peters Creek Road
Roanoke, VA 24019

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, West Central Regional Office, within four (4) daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement

explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XIV.C.3. of this permit.

(9 VAC 5-80-110 F.2 & 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after a deviation is discovered from permit requirements, notify the Director, West Central Regional Office, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within two weeks provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, West Central Regional Office.

(9 VAC 5-20-180 C and 9 VAC 5-80-250)

G. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions.

Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E, 9 VAC 5-40-20 E)

H. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.
2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
 - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
 - b. The permitted facility was at the time being properly operated.

- c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.
 - d. The permittee notified the board of the malfunction within two working days following the time when the emissions limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. The notice fulfills the requirement of 9 VAC 5-80-110 F.2. b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirements under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
 4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.
(9 VAC 5-80-250)

I. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried

sediments resulting from soil erosion.
(9 VAC 5-40-90 & 9 VAC 5-50-90)

J. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

K. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

L. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

M. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

N. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

O. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

P. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H & 9 VAC 5-80-340 C)

Q. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

R. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

S. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to

expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.
(9 VAC 5-80-110 L)

T. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

U. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may

suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C & 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Asbestos Requirements

The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

Z. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

AA. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

BB. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included

to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110 I)

XV. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor: none
2. State toxics rule:
 - a. The Fritz press shall not operate more than 16 hours per day.
(9 VAC 5-170-160, Condition 9 NSR permit dated 2/27/91amended 8/30/01)
 - b. The Columbia-3 opening press shall not operate more than 8 hours per day.
(9 VAC 5-170-160, Condition 10 NSR permit dated 2/27/91amended 8/30/01)
 - c. Emissions from the operation of the Fritz and the Columbia-3 opening press shall not exceed the limitation specified below:

Volatile Organic Compounds as Formaldehyde

0.20 lbs/hr	2.91 lbs/day	69.3 lb/month*
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*Formaldehyde emissions per month = Glue lb/month x %free Formaldehyde x 18% (where free Formaldehyde is less than 1%)

(9 VAC 5-50-260 and 9 VAC 5-50-180, Condition 11 NSR permit dated 2/27/91amended 8/30/01)

- d. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the West Central Regional Office. These records shall include, but not limited to:
 - (1) the throughput of free formaldehyde for the Fritz press and the Columbia-3 opening press as calculated in Condition 5

(2) hours per day of operation of each press.

These records shall be available on site for inspection by the Department and shall be current for the most recent three years.

(9 VAC 5-50-50 and 9 VAC 5-50-180, Condition 12 NSR permit dated 2/27/91amended 8/30/01)

- e. **COMPLETED-** In order to determine the compliance status of the entire facility in accordance with Rules 4-3 and 5-3 of the Regulations, information on the facility's emissions of the following substance must be submitted:

Formaldehyde

The attached Non-Criteria Emissions Information Forms shall be completed and returned within ninety (90) days of the date of this permit to the Director, Region III. Based on your submittal, this permit will be reviewed and may be modified or amended and additional emission controls required. Failure to complete and return the forms within the specified time is a violation of this permit.

(9 VAC 5-50-160, Condition 13 NSR permit dated 2/27/91amended 8/30/01)

3. Other: *none*

(9 VAC 5-80-110 N and 9 VAC 5-80-300)